Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
Digital Audio Broadcasting	)	MM Docket No. 99-325
Systems and Their Impact on the	)	
Terrestrial Broadcast Service	)	
	)	
To: The Commission	)	

COMMENTS OF GREATER MEDIA, INC.

Greater Media, Inc. (Greater Media), through its attorneys, hereby files these Comments in response to the Commission's Public Notice, "Comment Sought on National Radio Systems Committee DAB Subcommittee's 'Evaluation of the iBiquity Digital Corporation IBOC System'", DA 02-899, released April 19, 2002 (Public Notice). In support thereof, the following is shown:

1. Greater Media has been a broadcast licensee for over forty years, operating both AM and FM stations in communities large and small in many areas of the United States. Today, Greater Media, through various subsidiaries, is the licensee of stations in markets throughout the country, including Boston, Massachusetts, Philadelphia, Pennsylvania, Detroit, Michigan and New Brunswick, New Jersey. As a longtime licensee, Greater Media has participated extensively in Commission proceedings over the years looking toward amendment of the technical rules which are critical to maximizing high-fidelity interference-free broadcasting service to the public.

2. Greater Media is uniquely qualified to evaluate IBOC DAB. In particular, Greater Media has actively participated in the instant proceeding, filing extensive comments at earlier stages herein. It has likewise actively participated in industry forums since the concept of DAB was initially introduced in the United States in the early 1990s. More recently, Greater Media has participated in virtually all National Radio Systems Committee (NRSC) DAB activities as a

member of NRSC's DAB Subcommittee and various working groups. Greater Media personnel have assisted in the development and implementation of IBOC DAB laboratory and field test procedures. Mr. Milford Smith, Greater Media's Vice President of Radio Engineering, continues to serve both as chairman of the NRSC's DAB Subcommittee and as a member of the NRSC's DAB Subcommittee's test procedures and evaluation working groups. As a result of these activities, Greater Media has acquired an intimate knowledge of the problems and promise of DAB generally and of IBOC DAB in particular.

3. With respect to AM IBOC, representatives of Greater Media have participated extensively and exhaustively in the AM IBOC evaluation effort undertaken by the DAB Subcommittee of the NRSC. Further, several of Greater Media's FM stations continue to participate in tests of the IBOC transmission system.

4. In the end, the conclusions reached by the NRSC's evaluation working group as to deployment of the AM IBOC system were largely consistent with the test results and the intent of the Subcommittee to endorse digital deployment only to the extent that the underlying analog service was not significantly compromised. As with the FM IBOC system, certain minor tradeoffs are absolutely necessary when additional RF energy is imparted to a spectrum already heavily occupied with existing signals. Such tradeoffs are acceptable provided that they are never be permitted to reach the level at which they significantly compromise the integrity of the preexisting service.

5. In its endorsement of the deployment of AM IBOC during daytime hours only, the NRSC has struck the correct balance between assuring the initiation of digital transmission on the AM band and the preservation of existing analog service. Based on the exhaustive collection and evaluation of test data, initiation of IBOC service during daytime hours presages the dramatic transformation of AM radio from its current status as a largely poor-quality/voice-only medium to a digital service with audio quality on a par with today's analog FM. Perhaps most notably,

most types of man-made and natural interference, the scourge of today's AM radio service, are either eliminated entirely or made vastly more tolerable in the digital mode. Indeed, the NRSC found that digital transmissions were extremely robust in the presence of such impairments and interference.

6. In a properly allocated situation, AM digital coverage will replicate or slightly surpass the current analog "interference free" service area for most stations, providing a contour value of .5 mV/m, with good reception down to .3 mV/m as recently reported by the proponent. Most important, as evidenced by the NRSC's evaluation, the addition of the digital carriers to the AM spectrum will cause only minimal interference to existing stations and then only at the very periphery of their service areas, which generally comprise areas devoid of substantial listenership.

7. Because of the wholly different relationship of a station to its first adjacent channel neighbors during nighttime hours, entailing the potential for significantly increased interference among such facilities, the NRSC reached the only conclusion possible, given the data in hand, relative to nighttime service. Specifically, the NRSC at this time simply could not endorse nighttime operation of the proponent's AM IBOC system. This is a conservative, responsible and proper position to take at this point in the ongoing process of IBOC AM development. Although the nighttime interference problems appear potentially serious, the collection of more data along with nighttime test transmissions on selected stations may shed more light on the possibility of full-time AM digital operation.

8. It must be stressed that all of the NRSC's tests regarding the compatibility and reach of digital service were based on the parameters of the system as originally defined by the proponent. Any changes to those parameters prior to or during implementation of the AM IBOC system could adversely affect both of these critical criteria, undermining the conclusions of the NRSC's evaluation. Accordingly, Greater Media strongly recommends that if the Commission

chooses to permit the implementation of AM IBOC during daytime hours, then the transmission parameters must be mandated to match those used in the NRSC's system evaluation.

9. It must also be emphasized that the implementation of the hybrid mode (that is, the simultaneous transmission of analog and digital material) is merely a temporary phase in the transition to implementation of a fully digital broadcast service on both the AM and FM bands. An all-digital transmission mode is the ultimate goal. As clearly documented by the NRSC, achieving that goal will involve some minor and, in the opinion of the NRSC and Greater Media, acceptable tradeoffs during the interim period. Without these tradeoffs, the ultimate goal of a fully digital transmission mode can never be reached.

10. In light of the demonstrated feasibility of IBOC DAB service, Greater Media urges the Commission to move forward in a timely fashion with the authorization of the hybrid IBOC mode for both AM and FM stations. In an increasingly digital world, including most recently the initiation of fully digital direct-to-listener satellite services, the traditional terrestrial broadcaster needs to be able to rapidly implement a digital transmission service. Additionally, receiver manufacturers, key to the success of any new radio service, need the assurance that the consumers who purchase their new IBOC receivers will have digital program material to listen to. Each of these components – digital transmission, digital reception and digital programming – is critical to the successful implementation of the new digital radio service.

11. Greater Media applauds the Commission's efforts to establish IBOC DAB. Substantial restructuring of any allocations system requires careful consideration, which in turn takes time. Since it is likely that formal rules governing the implementation of the IBOC hybrid transmission mode may take a number of months to formulate, Greater Media respectfully requests that the Commission employ a mechanism akin to a blanket STA authorization to permit those stations wishing to be early adopters of the digital transmission scheme to initiate the service promptly. Any such STA scheme could be accompanied by an appropriate non-interference condition. The

proponent has a stated a goal of implementing IBOC on a sufficient number of stations in several of the top ten markets to assure that at least 50% of the radio audience is assured of digital service by the later part of calendar 2002. Greater Media supports this effort and believes that a rapid roll out is essential to broadcaster, receiver manufacturer and listener acceptance of the digital system.

12. In conclusion, exhaustive study has confirmed that an IBOC system is available today which can provide high-quality digital service without unduly compromising existing analog service. This is an exciting moment in radio. Greater Media urges the Commission to act expeditiously to adopt appropriate rules to govern IBOC DAB service and, in the meantime, to authorize temporary operations so that the broadcasters, manufacturers and the public alike can realize the benefits of digital service at the earliest possible time.

Respectfully submitted,

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